

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Ala Mohammad,

Plaintiff,

No. 07-6587

v.

City of Chicago,

Defendant.

Unopposed Motion for Extension of Time for Discovery

NOW COMES Plaintiff Ala Mohammad, by and through undersigned counsel, and moves this Honorable Court for an extension of time to complete discovery, and in support thereof states as follows:

1. Plaintiff's lead counsel, Patricia Kemling, no longer works at CAIR-Chicago and will be moving to withdraw from representation. CAIR-Chicago is in the process of hiring a new staff attorney and that individual will represent Plaintiff.
2. Plaintiff therefore seeks more time for completion of discovery and proposes the following adjusted discovery deadlines:
 - a. Fact discovery: September 11, 2008
 - b. Plaintiff's expert disclosure: October 3, 2008
 - c. Plaintiff's expert deposition: October 24, 2008
 - d. Defendant's expert disclosure: November 14, 2008

- e. Defendant's expert deposition: December 12, 2008
 - f. Dispositive motions: October 17, 2008
3. Plaintiff's counsel has discussed the aforementioned proposed schedule with Defendant's counsel, who does not object to it.

Accordingly, Plaintiff respectfully requests that the discovery deadlines be extended as proposed herein.

Respectfully submitted,

s/ Rima Kapitan

Rima N. Kapitan, Esq.
Attorney # 6286541
CAIR-Chicago
28 East Jackson Blvd., Suite 1410
Chicago, Illinois 60604
Ph: 312.212.1520
Fax: 312.212.1530
rima@cairchicago.org

CERTIFICATE OF SERVICE

I, Rima Kapitan, hereby certify that on July 7, 2008 I filed electronically the foregoing Unopposed Motion for Extension of Time for Discovery, which constitutes service to Kenneth Charles Robling, kenneth.robbling@cityofchicago.org and Marcela D Sanchez, msanchez@cityofchicago.org, who are registered participants of the CM/ECF system.

s/ Rima Kapitan

Rima N. Kapitan, Esq.
Attorney # 6286541
CAIR-Chicago
28 East Jackson Blvd., Suite 1410
Chicago, Illinois 60604
Ph: 312.212.1520
Fax: 312.212.1530
rima@cairchicago.org